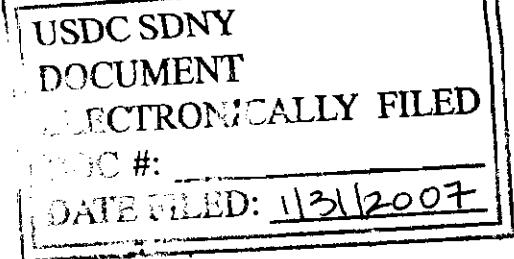


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACKSON LEWIS LLP
 One North Broadway, Suite 1502
 White Plains, New York 10601
 (914) 328-0404
 Joseph A. Saccamano, Jr. (JS 7504)



JACKSON LEWIS LLP
 59 Maiden Lane
 New York, New York 10038
 Nicole Quick Saldana (NS 6524)

-----x
DEBRA CHAMBERS-ENGLISH, :
 Plaintiff, : **Civ. No: 05-2976 (DC)**
 :
-against- : **NOTICE OF MOTION**
 :
UNISYS CORPORATION, :
 :
Defendant. :
 -----x

PLEASE TAKE NOTICE that upon the accompanying Local Rule 56.1 Statement of Material Facts, Defendant's Memorandum of Law in Support of its Motion for Summary Judgment, the Affidavit of Joseph A. Saccamano, Jr. Esq., with attached exhibits, and the Affidavits of Keith Noble, Armando Campea, James McKenna and Alan Schwartz, Defendant Unisys Corporation ("Defendant"), by and through its undersigned attorneys, Jackson Lewis LLP, will move this Court before the Honorable Denny Chin at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, New York 10007 for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting Defendant summary judgment as to all of Plaintiff's claims, and dismissing Plaintiff's Complaint in its entirety, and for such other and further relief as the Court may deem just and proper.

Pursuant to the Court's Order dated August 9, 2006, Plaintiff's answering papers are due to be served on September 26, 2006 and Defendant's reply is due to be served on October 10, 2006.

Respectfully submitted,

JACKSON LEWIS LLP
One North Broadway
15th Floor
White Plains, New York 10601
(914) 328-0404
(914) 328-1882

Dated: August 25, 2006
New York, New York

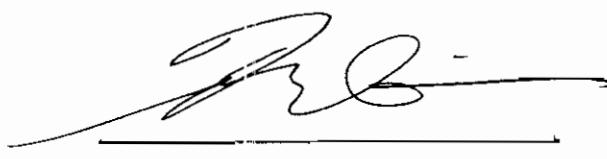
By: s/ Joseph A. Saccomano, Jr.
Joseph A. Saccomano, Jr., Esq. (JS 7504)

Nicole Quick Saldana, Esq. (NS 6524)
JACKSON LEWIS LLP
59 Maiden Lane
New York, New York 10038-4502
(212) 545-4000
(212) 972-3213 Facsimile

Alan Kintisch, Esq. (Admitted *pro hac vice*)
UNISYS CORPORATION
Township Line & Union Meeting Roads
P.O. Box 500
Blue Bell, Pennsylvania 19424-0001

ATTORNEYS FOR DEFENDANT
UNISYS CORPORATION

For the reasons set forth in the decision
dated January 31, 2007, the motion is GRANTED.



u.s.d.j

1/31/2007